



Air Quality Permitting Statement of Basis

July 14, 2003

**Tier II Operating Permit No. T2-030406
Northwest Foam Products, Inc., Twin Falls
AIRS Facility No. 083-00063**

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FINAL

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Acronyms, Units, and Chemical Nomenclature

AIRS	Aerometric Information Retrieval System
DEQ	Department of Environmental Quality
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
T/month	tons per month
T/yr	tons per year
VOC	volatile organic compound

PUBLIC COMMENT

A 30-day public comment period for the Northwest Foam Products draft Tier II operating permit was held from May 13 through June 12, 2003, as required by IDAPA 58.01.01.404.01, *Rules for the Control of Air Pollution in Idaho*. No comments were received.

1. PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01 Section 404.04 for Tier II operating permits.

2. PROJECT DESCRIPTION

This project is a Tier II operating permit renewal for Northwest Foam Products, Inc. (NWFP) located in Twin Falls.

3. FACILITY DESCRIPTION

NWFP produces expanded polystyrene (EPS) bead products such as block foam insulation, packaging materials, and architectural materials. The processes utilized in the production of these foam products include bead pre-expansion, drying, prepuff aging, block molding, and product aging. The primary pollutant emitted from the process is VOC's. The facility's Tier II operating permit limits potential VOC emissions below Tier I major source thresholds.

4. TECHNICAL ANALYSIS

This facility has not been modified since its initial Tier II operating permit was issued. No modification is proposed as part of this permit renewal. Because emissions are not increasing, an emissions and modeling analysis is not required.

For documentation purposes, Table 4.1 summarizes the facility's potential to emit.

Table 4.1 POTENTIAL TO EMIT SUMMARY

Facility, Location		
Emission Limits ^a – Monthly (T/month), and Annual ^b (T/yr)		
Source Description	VOC	
	T/month	T/yr
EPS Expansion	13	90

^a As requested by the applicant

^b As requested by the applicant. The permittee applied for a Tier II operating permit in order to maintain synthetic minor status and avoid major source permitting.

5. FEES

NWFP Tier II operating permit renewal application was received November 9, 2001 along with a \$500 application fee. When the application was submitted, the \$500 application fee was the only applicable fee associated with Tier II operating permits. Because the application was received before the effective date of the current fee structure (May 3, 2003), NWFP is not subject to any other fees (e.g. Tier II processing fee).

6. RECOMMENDATION

Based on the review of the application materials, and all applicable state and federal regulations, staff recommends that DEQ renew Tier II Operating Permit No. T2-030406 for NWFP for their Twin Falls facility. An opportunity for public comment on the air quality aspects of the proposed permit was provided in accordance with IDAPA 58.01.01.404.01.c.

DH/sd